

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**MICHELLE A. CAMPBELL,**

**Plaintiff,**

**v.**

**CITY OF MEMPHIS,**

**Defendant.**

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**No. 2:19-cv-2706-SHL-dkv  
JURY DEMAND**

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**DEFENDANT CITY OF MEMPHIS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

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Defendant City of Memphis moves for an extension of time until December 19, 2019, to answer or otherwise respond to Plaintiff's Complaint. In support of the instant Motion, Defendant states as follows:

1. Plaintiff filed the instant Complaint on October 16, 2019. (ECF No. 1.)
2. Plaintiff served Defendant City of Memphis on October 31, 2019. (ECF No. 9.)
3. Counsel for Defendant filed a Notice of Appearance on November 15, 2019. (ECF No. 11.)
4. Undersigned counsel has diligently worked to acquire the necessary factual information to respond adequately to Plaintiff's Complaint but requires additional time to evaluate Defendant's potential defenses.
5. Undersigned counsel is certain that the additional time requested will provide sufficient time to determine all appropriate defenses in this matter.
6. The purpose of this request is not to cause delay.

7. Plaintiff does not oppose extension of time for Defendant to answer or otherwise respond.

WHEREFORE, PREMISES CONSIDERED, Defendant prays the Court grant it an extension of time until December 19, 2019, to answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted, this 20th day of November 2019.

BURCH, PORTER & JOHNSON, PLLC

/s/ Sarah E. Stuart

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*Counsel for Defendant City of Memphis*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was forwarded via the Court's electronic filing system this 20th day of November, 2019 to counsel of record for this matter.

/s/ Sarah E. Stuart

### **CERTIFICATE OF CONSULTATION**

The undersigned hereby certifies that counsel for Defendant consulted with counsel for Plaintiff by email on November 19, 2019, and Plaintiff does not oppose this motion.

/s/ Sarah E. Stuart